UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

JAN 18 2011

Mr. David Keith
Project Coordinator
Anchor QEA
2113 Government Street
Building D, Suite 3
Ocean Springs, MS 39654

RE: Comments on Draft Sampling and Analysis Plan: Soil Study Addendum 1
San Jacinto River Waste Pits Superfund Site

Dear Mr. Keith:

The U.S. Environmental Protection Agency (EPA) has completed its review of the *Draft Sampling and Analysis Plan: Soil Study Addendum 1* (dated December 2010) for the San Jacinto River Waste Pits Superfund Site.

Enclosed with this letter are EPA review comments for the purpose of the Unilateral Administrative Order for Remedial Investigation/Feasibility Study for this site.

Please address each review comment and feel free to contact me at (214) 665-8409, or by email at tzhone.stephen@epa.gov, if there are any questions or comments.

Sincerely,

Stephen L. Tzhone
Remedial Project Manager

Enclosure

cc: Ms. Ludmila Voskov, TCEQ
Ms. Jessica White, NOAA
Ms. Herminia Palacio, HCPHES

633921

EPA Comments on *Draft Sampling and Analysis Plan: Soil Study Addendum 1* (dated December 2010)

1. General: To minimize confusion associated with potential addedums that may be needed for both the areas north of I-10 and south of I-10, we recommend approaching the southern impoundment as a separate operable unit with its own sampling plan and associated addendums.

2. Whole document: This southern impoundment sampling plan is based on interpretations in Section 1.4.1.3 Changes Over Time, which are made by Respondents based on evidence that could make sense, but there are other interpretations as well (see alternative regulatory interpretation below). Thus, the sampling plan for the southern impoundment should cover the entirety of the possible contaminated area, rather than relying on interpretations which may not be in consensus between the Respondents and regulators. Essentially, due to the uncertainties associated with different interpretations on the historical physical changes, both Areas 4a and 4b should be in the *initial* sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b.

   Alternative Regulatory Interpretation:

   The area termed the Southern Impoundment Area, south of I-10, comprises Modern-Holocene and Pleistocene abandoned channel, meanderbelt (point bar) and overbank depositional environments (BEG, 1972).

   Figure 3 is a 1966 USGS aerial photograph of the subject area. North of IH-10, stacked meanderbelt pointbar deposits are clearly visible on the inside bend of the San Jacinto River. One such deposit can be traced (as a stand of vegetation) to the south side of I-10 into the northeastern–most triangular area that lies between the approximate impoundment area and the San Jacinto River.

   Other stacked pointbar deposits that are visible immediately west of those described in the preceding paragraph do not appear south of I-10 in the area described as the "approximate impoundment boundary…". Instead, as is visible in Figure B-1 in Appendix B, the lighter-hued deposits appear to overlie the natural sediments as early as 1962 and are not considered to be natural.

   The outline of this boundary of the lighter-hued deposits is coincident with the site plan drawing of the boundary for the south waste pond that appears in the figure in TSDH (1966). Thus, the area containing lighter-hued deposits and which is labeled "approximate impoundment boundary…" should be included within the area comprising the Southern Impoundment.

   This results in the area comprising of the Southern Impoundment to correspond to Area 4a plus Area 4b, and as such, both Areas should be in the *initial* sampling effort for the Southern Impoundment Area.

   References:
   BEG 1972 *Environmental Geologic Atlas of the Texas Coastal Zone: Galveston - Houston Area*, Bureau of Economic Geology, The University of Texas at Austin, Austin, TX, 91 pp.

   TSDH 1966 *Investigation of Industrial Waste Disposal – Champion Paper, Inc.*, Inter-Office report, Texas State Department of Health, May 6, 1966.
   ---

3. Whole document for Cores (i.e., Section 1.9.1.2, Section 2.1, Section 2.2.2, notes on Figures, etc): Cores for nature and extent characterization needs to be collected to a minimum of 5' into native materials. Please revise text accordingly.

4. Section 1.4.1 Site Description and Section 1.6 Conceptual Site Model and Problem Definition: The discussion indicates that sediments around the southern impoundment area are not contaminated with dioxins and furans to levels above background, suggesting that contamination from the southern impoundment has not been released to the aquatic environment. Please present a figure that depicts the sample locations and validated results of sediment data around the southern impoundment to support this discussion.

5. Section 1.4.1.3 Changes Over Time: Please revise this whole section to include the alternative regulatory interpretation or summarize both interpretations with the main point being that uncertainties remain regarding historical physical changes; thus, both Areas 4a and 4b shall be in the *initial* sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b.

6. Section 1.6 Conceptual Site Model and Problem Definition: Figure 4 needs be modified to reflect a possible soil runoff pathway to surface water and sediment, even if it is indicated as unknown (as is indicated by the data gap discussion in Section 1.7.3).

7. Section 1.8 Task Description: Please revise text to reflect that both Areas 4a and 4b shall be in the *initial* sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b. Also, the text should be expanded to acknowledge that future sampling (beyond this *initial* sampling effort), if necessary, will be preceded by some sort of SAP.

8. Section 1.9.1.3 Performance of Risk Based Screens: Please delete '… in a majority of samples…' from this paragraph: "COI concentrations in each sample from surface and shallow subsurface increments will be compared to screening levels protective of human and ecological receptors. Those COIs with concentrations in a majority of samples that exceed screening levels will be addressed by a risk evaluation".

9. Section 1.9.2.2 Surface Topography: Revise text to reflect that field activities may be required to augment the LiDAR data, and strike the sentence that no field activities will be required.

10. Section 2.1, Sampling Design, Sample Stations: Please change surface and shallow subsurface sample stations SJTS034 and SJTS035 to soil cores stations. These particular locations were in the ponded area, based on the alternative regulatory interpretation of the 1966 aerial photo.